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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

AUG 30 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Rules For the Filing of)
International Circuit)
Status Reports)

CC Docket No. 93-157 /

COMMENTS OF COMSAT CORPORATION

COMSAT Corporation, through its COMSAT World Systems business unit (COMSAT), hereby submits comments in support of the proposals set forth in the Commission's rulemaking on the filing of international circuit status reports. The proposals contained in the rulemaking, released on July 2, 1993, will provide an effective means for obtaining industry-wide information on the use of international transmission facilities that is less burdensome and more efficient than the current process. COMSAT applauds the Commission for taking this initiative and urges prompt implementation of the measures proposed in the notice.

Specifically, COMSAT strongly supports the Commission's proposal to reduce the frequency of filing of international circuit status reports from a monthly to an annual basis. We agree with the Commission that no useful purpose is served by submitting data on a monthly basis. The proposed March 31 due date for filing data for the immediately preceding year is reasonable.

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List A B C D E

The notice proposes that the Common Carrier Bureau prepare and issue a filing manual containing reporting requirements and instructions for filing. We agree that a uniform filing manual and format would ensure consistency in information and facilitate comparisons. Regarding information requirements, COMSAT proposes that information be submitted on a country-by-country basis indicating the number of circuits in each transmission facility by service category for each country. We do not believe that specific customers need to be identified in the information submitted. Although COMSAT currently provides such information on a customer-by-customer basis, this specificity should no longer be required since, under the proposed rulemaking, all facilities-based carriers would be required to file their own reports including the facilities utilized. These reports should provide the Commission with information on facilities utilized by customers, and it would be redundant for COMSAT to duplicate this information.

We agree that only facilities-based common carriers should be required to file international circuit status reports and that private non-common carrier facilities need not submit such reports.¹ However, private cable and satellite facilities are utilized for common carrier services, and information on the use of these transmission facilities for international common carrier services is needed for assessing facilities usage by carriers.

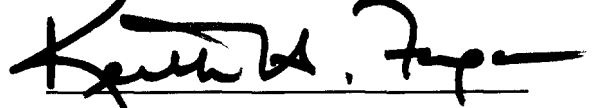
¹ Clarification is required as to whether common carriers licensed to operate international earth station facilities with transmission capabilities are included in the category of facilities-based carriers.

COMSAT urges the Commission to clarify that the minimum information requirements proposed in the notice regarding country-by-country information indicating number of circuits "in each transmission facility an international facilities-based carrier has activated for each of the specified services" include carrier use of private cables and satellites.

Regarding the Commission's request for suggestions on format, we support the filing of the required information on computer diskettes delivered in ASCII format. COMSAT suggests a header record on each file with control information such as source of data, date, etc., and specification in the filing manual as to whether countries should be identified by text or a three-character code.

In sum, COMSAT supports the proposals set forth in the rulemaking and urges their adoption by the Commission for implementation effective January 1994.

Respectfully submitted,
COMSAT Corporation
COMSAT World Systems

A handwritten signature in black ink, appearing to read "Keith H. Fagan", is written over a horizontal line.

Keith H. Fagan
6560 Rock Spring Drive
Bethesda, MD 20817
(301) 214-3457

Its Attorney